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District of Massachusetts

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U.S. DISTRICT COURT
DISTRICT OF MASS.
John Joseph Moakley United States Courthouse
1 Courthouse Way
Suite 9200
Boston, Massachusetts 02210

November 5, 2004

BY HAND DELIVERY

Honorable Mark L. Wolf
United States District Judge
U.S. District Court
One Courthouse Way
Boston, MA 02210

Re: United States v. Frederick Simone, et al.
Criminal Number 03-10356-MLW

Dear Judge Wolf:

I write to inform the Court concerning the status of the above-referenced matter. As of 5:00 PM on this date, defendant Francis White has accepted the terms of the government's plea agreement, and will provide an executed copy to the undersigned Assistant U.S. Attorney on Monday, November 8, 2004. Based on representations from defendant Vincent Gioacchini's counsel, Robert George, Esq., there is a very strong probability that Mr. Gioacchini will also accept the terms of the government's plea agreement, and will provide an executed copy of the agreement to the undersigned Assistant U.S. Attorney on Monday, November 8, 2004.

With respect to defendant Frederick Simone, the government has provided him with a plea agreement, but he has not yet accepted its terms. Based on conversations with Simone's counsel, Kevin Reddington, Esq., Mr. Simone seeks a brief period of additional time to evaluate the terms of the agreement. The government has therefore extended until Tuesday, November 10,

2004, the time within which the government must be notified that the agreement is either accepted or rejected.

Very truly yours,

MICHAEL J. SULLIVAN
United States Attorney

By:


~~JACK E. BRIGGS~~
ERNEST S. DINISCO
HEIDI E. BRIEGER
Assistant U.S. Attorneys

cc: Robert A. George, Sr., Esquire
Kevin J. Reddington, Esquire
Richard M. Egbert, Esquire
Patricia A. DeJuneas, Esquire